

O'BRIEN, BELLAND & BUSHINSKY, LLC

ROBERT F. O'BRIEN (NJ, PA & DC)
MARK E. BELLAND (NJ & PA)
STEVEN J. BUSHINSKY (NJ, NY & PA)
THOMAS F. KARPOUSIS (NJ)
KEVIN D. JARVIS (NJ & NY)
TIMOTHY P. HAGGERTY (NJ)
DAVID F. WATKINS, JR. (NJ & PA)
MATTHEW L. RAZZANO (NJ & PA)
W. DANIEL FEEHAN (NJ & PA)
MATTHEW B. MADSEN (NJ & NY)
DAVID H. LIPOW (NJ & PA)
PETER J. MOAK (PA & NJ)
RICHARD PLUMPTON (NJ)
DANIEL A. HOROWITZ* (NJ & PA)
*MASTERS OF LAW IN TAXATION

ATTORNEYS AT LAW
509 S. LENOLA ROAD
BUILDING 6
MOORESTOWN, NEW JERSEY 08057
(856) 795-2181
(888) 609-8300
FAX (856) 581-4214
INTERNET: WWW.OBBBLAW.COM
E-MAIL: OBBB@OBBBLAW.COM



OF COUNSEL
CARL J. MINSTER III (PA, NJ)
DAVID J. J. FACCILOLO (DE, PA)
DAVID R. THIERMAN* (NJ, PA & FL)
*MASTERS OF LAW IN TAXATION

JOAN FREEDMAN MEYER (NJ & PA)
1931-2011

EMAIL: DFEEHAN@OBBBLAW.COM

File No: 101713.398

May 13, 2021

SO ORDERED

Honorable Kevin McNulty, U.S.D.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

s/ Kevin McNulty
Hon. Kevin McNulty
U.S. District Judge
Date: 5/14/2021

**RE: Trustees of International Union of Painters and Allied Trades District
Council 711 Health & Welfare Fund, et. al. v. GMJC Construction Corp.
Case No: 2:20-cv-07083-KM-ESK**

Dear Judge McNulty:

Please recall, the undersigned is counsel to Plaintiffs, Trustees of International Union of Painters and Allied Trades District Council 711 Health & Welfare Fund, *et. al.* ("Funds"), in this matter. Plaintiff Funds filed a Motion [Dkt. 12] for default judgment which is pending before Your Honor.

Defendant GMJC Construction Corp. has submitted an offer to resolve this matter which must be approved by the Funds' Trustees. The Funds' Trustees are scheduled to be meet on June 8, 2021. Therefore, I respectfully request Plaintiff Funds' Motion be carried to June 21, 2021. If the Trustees approve Defendant's offer, I will withdraw the Motion.

Respectfully submitted,

O'BRIEN, BELLAND & BUSHINSKY, LLC

W. Daniel Feehan, Esquire

WDF/djh